

Testimony in Opposition to SB 1105

I am opposed to the SB 1105. There are many very troubling provisions included in SB 1105 (RAISED) AN ACT CONCERNING SPECIAL EDUCATION. In an effort to be brief in my objections to the proposed act, I will object to three of the more concerning provisions:

- 1) The act's proposed language states that individuals can provide Applied Behavior Analysis services would be those "including, but not limited to, persons employed as psychologists, speech therapists and positions requiring certification pursuant to section 10-145b with an endorsement in special education," . The proposed language assumes that not just the individuals cited directly in the its language who usually have no behavior analysis certifications or degrees, but also all those holding an endorsement in special education from the state of Connecticut or have a certificate from the State Department of Education or State Department of Health are qualified and/or have a degree in behavior analysis and can provide those services. This is absolutely inappropriate and misleading to parents and guardians of students seeking and expecting a qualified "free and appropriate" education in the state of Connecticut. The proposed language in SB 1105 would allow unqualified persons to legally provide Applied Behavior Analysis services. If SB No. 1105 is passed, it would be comparable to legislating that the State Department of Education in Connecticut can and does give Behavior Analysis degrees/certifications in the form of unrelated certificates that may have an endorsement for special education. Would the State Department of Education propose in the future the same language for other fields of Psychology or perhaps Psychiatry? Will the State of Connecticut Legislature seriously consider adopting such legislative changes?
- 2) The proposed language in SB1105 attempts to resolve the need for Applied Behavior Analysis services in Connecticut schools by shifting the burden of those services to professionals who are already overwhelmed by the demand for their services in their corresponding professional fields and most often do not have the necessary educational background, certifications and/or degrees to provide Behavior Analysis services .
- 3) The proposed language in SB1105 providing for "the local or regional board of education to designate an administrator employed by the board of education to supervise the provision of applied behavior analysis services" would, at the very least, make very difficult the work of qualified professionals certified by the Behavior Analyst Certification Board (BACB). Professionals and paraprofessionals certified by the BACB must adhere to our field's professional ethical and conduct guidelines. **The proposed language in SB 1105 for the supervision of applied behavior analysis services by an "administrator employed by the board of education" who is unlikely to be Board Certified in behavior Analysis comes in direct conflict with the BACB Guidelines for Responsible Conduct.** The language proposed in SB 1105 will hinder the involvement of any Board Certified Behavior Analyst (BCBA) or Board Certified assistant Behavior Analyst (BCaBA) in Connecticut Schools.

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